

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

In Re:) IN CHAPTER 11 PROCEEDINGS
)
VILLAGE OF WASHINGTON PARK,) BK 09-31744
)
Debtor.)

OBJECTION TO MOTION TO DISMISS

Comes now Village of Washington Park, debtor, and files this Objection to Motion to Dismiss filed by Eric Joelner, Fish Inc., First Amendment, Inc. and Free Speech, Inc. and in support thereof shows as follows:

1. Eric Joelner met with the bankruptcy attorney for the Village of Washington Park, the Village treasurer and the acting Village clerk on August 27, 2010 at the Village offices.
2. At the meeting records were available for Eric Joelner to review, however instead of reviewing records a discussion took place and Mr. Joelner requested to meet with the Village Board of Trustees to discuss the Village head tax on adult entertainment establishments and advised that he wanted to postpone looking at the records until after he met with the Village.
3. Eric Joelner was scheduled to meet with the Board of Trustees in executive session on September 7, 2010 however the meeting was running long and at approximately 10:00 p.m. Mr. Joelner advised the trustees that he had to leave to pick up his son.
4. The Village has received no further request from Mr. Joelner to meet with the Board nor to schedule a time to review the records.

WHEREFORE debtor, Village of Washington Park, prays that the prayers of the movant be denied and for such further relief as this Court deems just and equitable.

DATE: 11/10/10

/s/ Donald M. Samson
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CERTIFICATE OF SERVICE

The undersigned certifies that on the 10th day of November, 2010, a copy of the foregoing documents, Objection to Motion to Dismiss, were served upon the following by first class mail, postage prepaid:

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